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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KMI ZEOLITE, INC.; and ROBERT E.
FORD,

Plaintiffs,

v.

UNITED STATES DEPT. OF THE
INTERIOR; *et al.*,

Defendants.

Case No.: 2:15-cv-2038-MMD-VCF

UNITED STATES DEPT. OF THE
INTERIOR,

Counterclaimant,

v.

KMI ZEOLITE, INC.; ROBERT E. FORD;
and R.A.M.M. CORP.,

Counterclaim Defendants.

**JOINT PROPOSED
BRIEFING SCHEDULE**

Plaintiffs KMI Zeolite, Inc. (KMI) and Robert Ford (Ford), and the Federal Defendants, by their undersigned counsel, as requested by the Court in open court on March 2, 2018, hereby present their joint proposed briefing schedule for this case:

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1. Briefing on the APA issues in the *KMI Zeolite* case shall be as follows:

Plaintiffs KMI's and Ford's motions for summary judgment
and supporting briefs due: April 9, 2018

Briefs in response to all motions for summary judgment due: May 9, 2018

Reply briefs in support of summary judgment due: June 8, 2018

2. Initial Disclosures due: 30 days after order disposing of
APA issues in *KMI Zeolite*

3. Amendment of Pleadings due: 30 days after Initial Disclosures

4. Fact Discovery closes: 180 days after Initial Disclosures

5. Expert Discovery:

a. Last day to designate Plaintiffs' experts: 30 days after fact discovery close

b. Last day to designate Defendant's experts: 60 days after fact discovery close

c. Last day to designate rebuttal experts: 90 days after fact discovery close

c. Last day to complete expert discovery: 120 days after fact discovery
close

6. Dispositive Motions due: 30 days after expert discovery
close

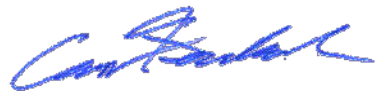
7. Pre-Trial Order:

a. Last date to file if no dispositive motions are filed: 30 days after expert
discovery close

b. Last date to file if dispositive motions are filed: 30 days after order resolving
last dispositive motion

IT IS SO ORDERED.

Date: 3-5-2018



UNITED STATES MAGISTRATE JUDGE

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1 For the APA Plaintiffs:

2 /s/ Karen Budd-Falen

3 KAREN BUDD-FALEN
4 Attorney for KMI Zeolite, Inc.

5 /s/ Eric Dobberstein

6 ERIC DOBBERSTEIN
7 Attorney for Robert Ford

8 For the quiet title plaintiff:

9 /s/ Eric Dobberstein

10 ERIC DOBBERSTEIN
11 Attorney for ABC Recycling Industries, Inc.

For the Federal Defendants:

DAYLE ELIESON
United States Attorney

/s/ Roger Wenthe

ROGER W. WENTHE
Assistant United States Attorney

For the quiet title defendant:

/s/ Michael Stoberski

MICHAEL STOBERSKI
Attorney for R.A.M.M., Inc.

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14 **PROOF OF SERVICE**

15 The undersigned certifies that a copy of the foregoing document was served on the persons
16 shown, by the method shown, on the date shown.

17 CM/ECF

18 All counsel of record

19 Dated: March 5, 2018

/s/ Roger W. Wenthe

ROGER W. WENTHE
Assistant United States Attorney